

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

	:	Case No. 19-26744 (KCF)
In re:	:	Chapter 7
	:	
Bruce L. DeGeorge,	:	The Honorable Kathryn C. Ferguson
	:	
Debtor.	:	
	:	

**APPLICATION FOR THE ENTRY OF A CONSENT ORDER EXTENDING TIME TO
FILE A MOTION TO DISMISS CASE UNDER 11 U.S.C. § 707(b)(1) AND (3) AND
EXTENDING TIME TO FILE A COMPLAINT OBJECTING TO DISCHARGE UNDER
11 U.S.C. § 727 TO DECEMBER 31, 2019**

The Acting United States Trustee, by and through counsel, in furtherance of his duties and responsibilities under 28 U.S.C. § 586 (a)(3) and (5), hereby respectfully submits this Application for the Entry of the Consent Order Extending Time to File a Motion to Dismiss Case Under 11 U.S.C. § 707(b)(1) and (3) and Extending Time to File a Complaint Objecting to Discharge Under 11 U.S.C. § 727 to December 31, 2019.

In support of this Application, the Acting United States Trustee (“UST”) respectfully represents as follows:

1. On August 30, 2019, Bruce L. DeGeorge (“Debtor”) filed a voluntary petition for relief under chapter 7 of title 11 of the United States Code.
 2. On August 31, 2019, Karen E. Bezner, Esq., was appointed as the chapter 7 trustee.
- The meeting of creditors pursuant to 11 U.S.C. § 341(a) was held on September 27, 2019.

3. The deadline to oppose discharge or dischargeability is November 26, 2019.
4. An independent review conducted by the Office of the United States Trustee of the Debtor's Petition, Schedules, Statement of Financial Affairs, and Means Test identified this case as a possible candidate for dismissal pursuant to U.S.C. § 707(b)(1) and (3) or objection to discharge under 11 U.S.C. § 727.
5. On October 9, 2019, the UST, by and through counsel, issued a *Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Bankruptcy Case (or Adversary Proceeding)* ("Subpoena") to the Debtor seeking information related to the Debtor's income, monthly expenses, assets, liabilities, and retirement plan contributions. Documents were due by October 28, 2019, pursuant to the Subpoena.
6. On October 25, 2019, and November 22, 2019, the undersigned received certain documents from Debtor's counsel in response to the Subpoena, which are currently under review.
7. The UST has secured the consent of Debtor's counsel to further extend the time to file a motion to dismiss for abuse under 11 U.S.C. § 707(b)(1) and (3) and to extend the time to file a complaint objecting to discharge under 11 U.S.C. § 727 to December 31, 2019.
8. Accordingly, the UST requests the entry of the attached proposed consent order as discovery is ongoing in this matter.

Respectfully submitted,
ANDREW R. VARA
ACTING UNITED STATES TRUSTEE
REGION 3

By: /s/Michael A. Artis
Michael A. Artis
Trial Attorney

DATED: November 26, 2019